

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
District of Massachusetts

Robert Druhan

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Indira Talwani, Moderna, Moderna Inc, Dechert LLP

Jury Trial: (check one)



Yes



No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Robert Druhan
Street Address	186 Royal Road
City and County	Brockton
State and Zip Code	Ma 02302
Telephone Number	774-273-4690
E-mail Address	robertdruhan@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1**Name** Indira Taiwani**Job or Title (if known)** Judge**Street Address** 1 Courthouse Way**City and County** Boston**State and Zip Code** Ma 02210**Telephone Number** _____**E-mail Address (if known)** _____**Defendant No. 2****Name** Modema, Modema TX Inc**Job or Title (if known)** _____**Street Address** 325 Binney Street**City and County** Cambridge**State and Zip Code** Ma, 02142**Telephone Number** _____**E-mail Address (if known)** _____**Defendant No. 3****Name** Dechert LLP**Job or Title (if known)** _____**Street Address** 100 Oliver Street, One International Place, 40th Floor**City and County** Boston**State and Zip Code** Ma 02110-2605**Telephone Number** _____**E-mail Address (if known)** _____**Defendant No. 4****Name** _____**Job or Title (if known)** _____**Street Address** _____**City and County** _____**State and Zip Code** _____**Telephone Number** _____**E-mail Address (if known)** _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____ . Or is a citizen of
(foreign nation) _____.

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b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Added Paperwork

Judge Shopping Violates my rights
Violates my right to fair trial.
Moderna Picked Judge Talwani knowing
Site would protect Moderna vaccine ✓

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

2,000,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

10/31/2024

Signature of Plaintiff

Robert Druhan

Printed Name of Plaintiff

Robert Druhan

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

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Date of signing: 10/31/2024

Signature of Plaintiff



Printed Name of Plaintiff

Robert Druhan

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

When I filed my civil suit Druhan V Hoge I filed it in Brockton Superior Court. The moderna attorneys brought My civil suit to United States District Court federal court.

Moderna went judge shopping and they picked judge Talwani knowing judge Talwani would protect the moderna vaccine. Moderna knew exactly what Judge they wanted.

Moderna picking the judge, Judge Talwani violates my rights denies my right to a fair trial

Barack Obama appointed judge Talwani Barack Obama is friends with the president of moderna Stephen Hoge and the leadership of moderna.

Moderna is a donor \$\$ to the Liberal Democratic party cult. Judge Talwani, the clerk magistrate, Barack Obama modernas Stephen Hodge , Stephan Bancel, Noubar Afeyan, ABC News David Muir, NBC, CBS, CNN doctor Anthony Fauci and all listed in my civil suits are all members of the Liberal Democratic party cult.

When they appointed judge Talwani I requested switching the judge from Judge Talwani they did not.

When I filed my Recent civil suits I requested not to give me a liberal judge they did not listen to me. All my civil suits were appointed to Judge Talwani violating my rights, violating my right to a fair trial

Judge talwani responded in my civil suit Druhan v Hoge that she dismissed my civil suit because of the public readiness and emergency preparedness act this is not true.

Talwani dismissed my civil suit Druhan v Hoge for no reason I did not even enter my evidence yet Judge Talwani was told to dismiss my civil suit Druhan vHoge.

Who did judge Talwani and the clerk magistrate talked to about my civil suits I was intentionally appointed judge Talwani Did Barack Obama speak to judge Talwani about my civil suit. This violates my rights denies my right to a fair trial.

All my evidence I presented proves the moderna vaccine is poison to the human body the moderna vaccine is a con Stephen Hoge, Stephan Bancel, Noubar Afeyan are con artist.

The public readiness and emergency preparedness act does cover, protect cons and con artist. It says it in the act. I mentioned this already but crocked judge Talwani is ignoring this she here to protect the modernas vaccine.

All statements made by moderna , Stehane Hoge, Stephan Bancel, Noubar Afeyanwere were all lies. All my evidence proves it all the people that were injured and died from the moderna vaccine and that a dying every day.

All my medical records prove the moderna vaccine is poison to the human body. I was in perfect health Before the moderna vaccine. Now my heart and body are destroyed from the moderna vaccine.

I'm in atrialfibrillation every day and night. I've been to the hospital for the third time with a raised heartrate. I have a constant irregular heartbeat my hands stopped working after using them for 15 minutes.

My muscles in my feet are half dead I have very painful pins and needles in both arms and in both legs I have chest pains I have to take metoprolol every day to lower my heart rate. I was in perfect health before I received the moderna vaccine.

My brain feels dead the moderna vaccine caused me to be type 1 diabetic I have to inject myself with insulin all day and night long.

Federal courts and federal law cannot protect cons and con artists this is common sense the modernas vaccine has no protection. Modernas leadership has no protection.

I have already stated this several times but crooked judge Talwani is ignoring this all judge shopping involves liberal judges. Judge shopping with liberal Judges make all other judges look bad.

Judge Talwani Denied my request for an attorney I am dealing with serious side effects from the moderna vaccine and have proven so many people have died only a crooked judge would not provide an attorne.

Judge Talwani sees the moderna vaccine as killing white people so she don't does not care.

Judge Talwani and her family and friends were forced to get the moderna vaccine judge Talwani will still protect the Liberal Democratic cult and the modernas vaccine.

Talwani should have her family and friends read my evidence. Then read what she is doing.

The liberal Democratic cult use the moderna vaccine for power and control so in turn modern is allowed to kill as many people as they want. Many people and government agencies are in on the the moderna con, FDA, CDC, doctors, hospitals. Liberal news.

They all sold the moderna vaccine con and they all are liable.

My recent civil suits that I mailed to Federal Court , Moakley Court House. The clerk magistrate and Judge Talwani say I did not sign paperwork but instead of mailing the paperwork back to me to have it signed they entered my civil suits and gave them case numbers.

Then they held on to my civil suits for two months then informed me papers were not signed. Then returned it back to me saying I have to sign these paperwork and I have so many days to return them.

At that time I was in the hospital for the third time from the side effects of the moderna vaccine consisting of my heart being stuck at 160 beats a minute.

Judge Talwani should of provided an attorney to me. The federal government is particularly responsible for my injuries from the moderna vaccine. I have proven that so many people have died from the modrna Vaccine and are dying every day.

Talwani knows the moderna vaccine only had a negative effect on people.

I need to check if all my evidence is still there.